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Technologies, LLC; Instagram, LLC; and
Siculus, Inc.*

UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF CALIFORNIA

IN RE: SOCIAL MEDIA ADOLESCENT
ADDICTION/PERSONAL INJURY PRODUCTS
LIABILITY LITIGATION

This Document Relates To:

ALL ACTIONS

MDL No. 3047

Case No. 4:22-md-03047-YGR (PHK)

**DECLARATION OF MICHAEL X.
IMBROSCIO IN SUPPORT OF JOINT
LETTER BRIEF REGARDING
PRIVILEGE DETERMINATION IN
CONNECTION WITH DEPOSITION OF
MIKI ROTHSCHILD**

Judge: Hon. Yvonne Gonzalez Rogers

Magistrate Judge: Hon. Peter H. Kang

DECLARATION OF MICHAEL X. IMBROSCIO

I, Michael X. Imbroscio, declare and state as follows:

1. I am an attorney with the law firm Covington & Burling, LLP and represent Meta Platforms, Inc. f/k/a Facebook, Inc.; Facebook Holdings, LLC; Facebook Operations, LLC; Facebook Payments, Inc.; Facebook Technologies, LLC; Instagram, LLC; and Siculus, Inc. in the above-captioned case. The declaration is based on my personal knowledge. If called upon to do so, I could and would competently testify as follows.

2. The exhibits referenced in the following chart are true and correct copies of the documents bearing the Bates numbers—both the original Bates number and the beginning Bates number of a reproduction with redactions—reflected in the chart. Redacted versions of these exhibits are concurrently filed under seal and unredacted versions will be lodged with the Court for *in camera* review.

Original Bates Number	Beginning Bates Number of Reproduction with Redactions	Meta's Exhibit
META3047MDL-035-00002871	META3047MDL-085-00000104	A
META3047MDL-035-00004050	META3047MDL-085-00000271	B
META3047MDL-073-00001477	META3047MDL-085-00000211	C

I declare under penalty of perjury of the laws of the United States that the foregoing is true and correct. Executed on November 25, 2024.

By: /s/ Michael X. Imbroscio

Michael X. Imbroscio